

RECEIVED

UNITED STATES DISTRICT COURT
 FOR THE
 NORTHERN DISTRICT OF ILLINOIS - EASTERN DIVISION
 MICHAEL W. DOBBINS
 CLERK, U.S. DISTRICT COURT

AFFIDAVIT OF COMPLAINT (OR INDICTMENT) IN REMOVAL PROCEEDINGS

UNITED STATES OF AMERICA)

v.)

CHRISTOPHER F. FERSZT)

MAGISTRATE JUDGE COXCASE NUMBER: **07CR 832**


The undersigned Affiant personally appeared before SUSAN E. COX, a United States Magistrate Judge, and being duly sworn on oath, states: That at the EASTERN DISTRICT OF MICHIGAN, one CHRISTOPHER F. FERSZT, was charged in an Indictment with violations of Section 846 of the United States Code, Title 21, and that on the basis of Affiant's investigation and information received concerning the case through official channels, does hereby certify that a Warrant for Arrest is outstanding for the arrest of said defendant (see Exhibit A - Warrant for Arrest and Indictment);

Wherefore, Affiant prays that the defendant be dealt with according to law.

FILED

DEC 13 2007

MICHAEL W. DOBBINS
 CLERK, U.S. DISTRICT COURT


 Hamal Patel
 Deputy U.S. Marshal

Subscribed and Sworn to before me this
13th day of December, 2007.


 SUSAN E. COX
 United States Magistrate Judge

AUSA Lindsay C. Jenkins
 312-353-0962

Bond set [or recommended] by issuing Court at _____

UNITED STATES DISTRICT COURT*Eastern District of Michigan, Southern Division*AUSA Abraham
DEA Nedoff

UNITED STATES OF AMERICA

WARRANT FOR ARREST

Case No.

07-20484

D-2 CHRISTOPHER FRANK FERSZT

TO: The United States Marshal
and any Authorized United States Officer**PAUL V. GADOLA**

YOU ARE HEREBY COMMANDED to arrest Christopher Frank Ferszt and bring him or her forthwith to the nearest magistrate to answer a(n)

☒ Indictment ☐ Information ☐ Complaint ☐ Order of Court ☐ Violation Notice ☐ Probation Violation Petition

charging him or her with marijuana conspiracy in violation of Title 21 United States Code, Section 846.

DAVID J. WEAVER

Name of Issuing Officer

TAMMY M. HALLWOOD

Signature

COURT CLERK

Title of Issuing Officer

10/3/07 Flint, MI

Date and Location

Bail fixed at \$ _____ by _____
Name of Judicial Officer

RETURN

This warrant was received and executed with the arrest of the above-named defendant

DATE RECEIVED

NAME AND TITLE OF ARRESTING OFFICER

SIGNATURE OF ARRESTING OFFICER

DATE OF ARREST

FILED

OCT - 3 2007

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

U.S. DISTRICT COURT
FLINT, MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

NO.

07-20484

v.

HON. PAUL V. GADOLA

D-1 JOSEPH SANTANA,
D-2 CHRISTOPHER FRANK FERSZT,
D-3 ARMEN TAFRALIAN,
D-4 RONALD LEROY MEYERS,
D-5 JOSE FERNANDEZ GASTELUM,

Defendants.

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

21 U.S.C. §846; Marijuana Conspiracy

D-1 JOSEPH SANTANA,
D-2 CHRISTOPHER FRANK FERSZT,
D-3 ARMEN TAFRALIAN,
D-4 RONALD LEROY MEYERS,
D-5 JOSE FERNANDEZ GASTELUM,

That beginning sometime in the fall of 2000 and continuing until about January 27,
2006, in the Eastern District of Michigan and elsewhere, JOSEPH SANTANA,

CHRISTOPHER FRANK FERSZT, ARMENTA FRALIAN, RONALD LEROY MEYERS, and JOSE FERNANDEZ GASTELUM did knowingly conspire with each other and with other persons to possess with intent to distribute and to distribute more than one thousand kilograms of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

COUNT TWO

21 U.S.C. § 853; Forfeiture

D-1 JOSEPH SANTANA,
D-2 CHRISTOPHER FRANK FERSZT,
D-3 ARMEN TAFRALIAN,
D-4 RONALD LEROY MEYERS,
D-5 JOSE FERNANDEZ GASTELUM,

1) Upon conviction of the controlled substance violation of Title 21, United States Code, Section 846 alleged in Count One of this Indictment, the defendants CHRISTOPHER FERSZT, JOSE FERNANDEZ-GASTELUM, RON MEYERS, JOSEPH SANTANA, and ARMEN TAFRALIAN shall, pursuant to Title 21, United States Code, Section 853(a), forfeit to the United States any property constituting or derived from any proceeds the defendants obtained, directly or indirectly, as the result of such violation including, but not limited to, proceeds of at least \$1,320,000 derived from the sale or delivery of at least 1000 kilograms of marijuana or a sum of money equal thereto for which defendants are jointly and severally liable;

2) Upon conviction of the controlled substance violation of Title 21, United States Code, Sections 846 alleged in Count One of this Indictment, the defendants CHRISTOPHER FERSZT,

JOSE FERNANDEZ-GASTELUM, RON MEYERS, JOSEPH SANTANA, and ARMEN TAFRALIAN shall, pursuant to Title 21, United States Code, Section 853(a), forfeit to the United States any of the defendants' property used, or intended to be used, in any manner or part to commit or to facilitate the commission of such violation including, but not limited to:

(A) Real Property:

- (i) 9665 Northwest Court, Clarkston, Oakland County, Michigan 48346 and
being more fully described as:

Lot 2 of VALENTINE'S INDUSTRIAL PLAT, according to the plat thereof recorded in Liber 179 of Plats, page(s) 14 of Oakland County Records; commonly known as: 9665 Northwest Court, Clarkston, MI 48346. Parcel ID: 07-26-327-002

- (ii) 3284 Joslyn Rd., Auburn Hills, Oakland County, Michigan 48326-1431 and
being more fully described as:

Lots 13 and 14 of Supervisor's Plat No. 5, as recorded in Liber 50 of Plats, page 23, Oakland County Records, except the following described parcel: Beginning at the Northwest corner of Lot 13; thence South 31°15'30" West along the Southeasterly line of Joslyn Road (66 feet wide) 317.10 feet; thence South 71°48'30" East 180 feet; thence North 31°15'30" East 393.22 feet to the North line of Lot 13; thence North 86°17'10" West along the North line 210.69 feet to the point of beginning of said exception, also excepting part of said Lot 14, conveyed to the Board of County Road Commissioners for the County of Oakland, described as follows: Beginning at the Southwest corner of Lot 14; thence along the Westerly line of said Lot 14, North 31°15'30" East 215.12 feet; thence South 71°48'30" East 43.12; thence South 31°15'30" West 196.07 feet; thence South 86°49'30" West 50.92 feet along the South line of Lot 14 to the point of beginning of said exception, and also excepting part of said Lots 13 and 14, more particularly described as: Beginning at the Northeast corner of said Lot 13; thence South 46°34'35" West 145.30 feet; thence South 18°13'31" West 86.33 feet; thence South 01°30'25" East

76.03 feet; thence South 27°49'30" East 81.41 feet; thence South 58°52'40" East 115.05 feet; thence South 89°51'03" East 16.0 feet to a point on the East line of said Lot 14; thence North 03°13'38" West 390.0 feet along the East line of said Lots 13 and 14 to the point of beginning of said exception. Parcel ID: 14-09-202-027

- (iii) 11319 Hillside, Putnam Township, Livingston County, Michigan and being more fully described as:

SEC 31 T1N R4E COM SE COR OF SUPERVISOR'S PLAT OF WEISS LANDING #2 TH N4*W 350.18 FT TO POB, TH N4*W 121 FT, TH N87*E 300 FT, TH N70*E 791.24 FT, TH S4*E 353.02 FT, TH S87*W 1067.27 FT TO POB 5 AC M/L SPLIT 8/91 FROM 012, Parcel Number 4714-31-100-026

and SEC 31 T1N R4E COM SE COR SUPERVISOR'S PLAT OF WEISS LANDING #2 TH N4*W 471.18 FT TO POB, TH N4*W 190.1 FT, TH S87*W 81.27 FT, TH N5*E 300.5 FT, TH N87*E 680.66 FT, TH N5*E 331.7 FT TH N2*W 30 FT TH N87*E 353 FT, TH S4*E 629.08 FT, TH S70*W 791.24 FT, TH S87*W 300 FT TO POB 13.57 AC SPLIT 8/91 FROM 012 TO POB 5 AC M/L SPLIT 8/91 FROM 012, Parcel Number 4714-31-100-027

3) If any of the property described in paragraphs 1 and 2 hereof as being forfeitable pursuant to Title 21, United States Code, Section 853, as a result of any act or omission of the defendants –

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America, pursuant to Title 21, United States Code, Section 853(p), intends to seek forfeiture of all other property of the defendants up to the value of the forfeitable property described in paragraphs 1 and 2.

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
FOREPERSON

Dated: October 3, 2007

STEPHEN J. MURPHY
United States Attorney

s/NANCY A. ABRAHAM
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Assistant United States Attorney-in-Charge